## LEASON ELLIS

June 22, 2018

VIA ECF & FACSIMILE (212-805-7942)

Hon. Alvin K. Hellerstein, U.S.D.J. U.S. District Court, Southern District of New York United States Courthouse 500 Pearl Street, Room 1050 New York, NY 10007 One Barker Avenue Fifth Floor White Plains, New York 10601 Tel: (914) 821-3075 Fax: (914) 288-0023

Cameron Reuber Partner Reuber@leasonellis.com

RE: *Hop Hop Productions, Inc. v. Kneupper, et al.*, Civil Action No. 18-cv-4670-AKH (S.D.N.Y.)

Dear Judge Hellerstein:

Our firm represents Defendants Tara Crescent and Jennifer Watson in the above-captioned matter. We write jointly with Plaintiffs' counsel to advise the Court of a settlement in principle reached by the parties that will resolve all claims and disputes between them. Per the current schedule set by the Court, Defendants had originally intended to move to dismiss the complaint today. However, in light of the settlement reached, the parties respectfully request that the Court administratively terminate this action without prejudice for either party to apply by letter to have this matter restored to the active docket on or before Friday, July 6, 2018. The parties expect to draft and execute a settlement agreement before July 6th such that further proceedings would be unnecessary (as well as potentially deleterious to settlement negotiations).

Wherefore, the parties jointly request that Your Honor direct the Clerk of Court to remove this matter from the active docket without prejudice for any party to seek reinstatement on or before <u>Friday</u>, <u>July 6</u>, <u>2018</u>, and otherwise note the consent of the parties to the automatic dismissal of this matter with prejudice if no written application is submitted by that date.

Alternatively, should the Court deny this request, the parties request an extension of Defendants' time to move to dismiss the complaint until <u>Friday</u>, <u>July 6</u>, <u>2018</u>. This alternative request would be the first request made by the parties to adjourn the deadline to plead or otherwise respond to the complaint. This request is not expected to affect any other deadlines.

If you require additional information, please do not hesitate to contact us.

Respectfully submitted,

Cameron Reuber

cc: All Counsel of Record (via email)